



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

February 20, 2024

Delivered electronically to [info@thurstondemwomen.org](mailto:info@thurstondemwomen.org) , [daniwestbrook@gmail.com](mailto:daniwestbrook@gmail.com) and [jswonderwoman84@gmail.com](mailto:jswonderwoman84@gmail.com)

Subject: Complaint filed by Glen Morgan, PDC Case 141168

Dear Thurston County Democratic Women:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

Pursuant to WAC 390-37-060(1)(d), however, this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Morgan. In the future, PDC staff expect you to timely file *Campaign Summary Receipts & Expenditures* reports (C-4 reports) and *Cash Receipts, Monetary Contributions* reports (C-3 reports), especially during the time-sensitive periods prior to elections. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff is also reminding you about the importance of 1) disclosing the name and address of the vendor from whom an item or service is purchased, either as an-kind contribution made to the committee or as an expenditure for which reimbursement is sought, on C-4 reports; and 2) submitting amended reports within 21 days of the original reports, whenever possible. PDC staff expects that, in the future, you will timely disclose the above information in accordance with PDC laws and rules or guidance.

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

Sincerely,

Electronically signed Tabatha Blacksmith  
Tabatha Blacksmith  
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavallee  
Peter Frey Lavallee  
Executive Director



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February 20, 2024

Delivered electronically to [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint regarding Thurston County Democratic Women, PDC Case 141168

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 8, 2023. The complaint alleged that Thurston County Democratic Women, a continuing political committee, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately file *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) disclosing contributions and expenditures for election years 2020-2023, including vendor name and address for in-kind contributions.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the responses provided by Thurston County Democratic Women (the “Respondent”); the applicable PDC reports filed by the Respondent; and other relevant information to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- RCW 42.17A.205 requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report). A committee that selects the Full Reporting option on its C-1pc report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee’s election participation, and its financial activity.
- Pursuant to RCW 42.17A.240(2), C-4 reports must include, but are not limited to, the name and address of each person<sup>1</sup> who contributed more than \$100<sup>2</sup> during the period

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<sup>1</sup> "Person" includes “an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized.” [RCW 42.17A.005\(39\)](#).

<sup>2</sup> Per [WAC 390-05-400](#), this dollar amount increased from \$25 to \$100 effective April 1, 2023.

covered by the report; and the value and date of each contribution. “Contribution<sup>3</sup>,” as defined, includes an in-kind contribution. An expenditure greater than \$200<sup>4</sup> must be itemized to disclose purpose/description details and vendor/recipient name and address.

- Pursuant to RCW 42.17A.235(10), amended reports should be submitted within 21 days of filing the original report. If there is no pending complaint about the report being amended and it meets the conditions set forth in .235(10)(a) through (d), it is not evidence of a violation to submit an amended report within 21 days of the original report.
- On August 21, 2023, the Respondent responded to the complaint allegations and said:
  - The late reports were the result of a misunderstanding concerning when reports are due, and that noncompliance was not intentional.
  - The committee’s Treasurer recently changed, reports are being timely filed, and late reports should no longer be an issue.
  - The previous Treasurer did not realize vendor name and address should be included when reporting in-kind contributions, asked where this information should be entered on reports, and requested additional guidance on how to amend reports.
- A Case Status Review (Initial Hearing) was held for this case on November 1, 2023. The committee’s current Treasurer, Danielle Westbrook, attended the hearing remotely. At the review/hearing, Ms. Westbrook explained that a previous Treasurer thought that all C-4 reports are due on the 10th date of the following month and did not realize there are different due dates for pre- and post-election C-4 reports and weekly C-3 reports.
- The Respondent does not have previous warnings/violations of PDC requirements.

#### Allegation: Missing Vendor Name & Address for In-kind Contributions (2020-2023)

- The Respondent committee reported a total of six in-kind contributions in election years 2020 and 2021, three of which were from individuals and three of which were from businesses (vendors) whose name and address appeared on reports. Of the three remaining entries for individuals, two lacked vendor name and address (see below), and one was a \$1,000 “consulting fee” contributed by an individual (Danielle Westbrook) whose address appeared on the report. No in-kind contributions were reported during election years 2022 and 2023.
- On their monthly C-4 report for March of 2020, the Respondent failed to disclose the name and address of the vendor from whom an in-kind contribution of “brunch food” from Danielle Westbrook, dated 3/7/2020 and valued at \$274.22, was purchased (report [100964617](#)).

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<sup>3</sup> [RCW 42.17A.005\(15\)\(a\)](#) defines a “contribution” to include a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, transfer of funds or anything of value, including personal and professional services for less than full consideration. [WAC 390-05-210\(1\)](#) further defines “contribution” to include, but not be limited to, furnishing services, property, or rights on an unequal basis or at less than fair market value for the purpose of assisting any candidate or political committee, and refers to the latter as an “in-kind contribution.”

<sup>4</sup> Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

- In an email dated October 30, 2023, the Respondent indicated that it was unable to successfully amend report 100964617 for March of 2020 despite obtaining assistance from PDC staff. In lieu of amending the report, the Respondent confirmed in writing that Danielle Westbrook purchased the brunch food at Costco, located at 1470 Marvin Rd. NE Lacey, WA 98516.
- At the committee’s November 1, 2023 Initial Hearing (Case Status Review), Ms. Westbrook explained that their inability to amend the March 2020 report was caused by uploading the wrong year of ORCA, the PDC’s online filing system.
- Your complaint specifically alleged that the Respondent failed to disclose the name and address of the vendor from whom an in-kind contribution of “champagne” from Susan Herring, dated 8/29/2021 and valued at \$28.52, was purchased. The above in-kind contribution appeared on Schedule B of the Respondent’s C-4 report for 7/27/2021 – 8/31/2021 (report 110067070).
  - The Respondent amended Schedule B of the above C-4 report on 9/10/2023 to include the missing information. They disclosed that Susan Herring purchased the champagne at Costco, located at 5500 Littlerock Rd. in Tumwater, WA (amended report [110171242](#))
- It should be noted that PDC guidance concerning in-kind contribution details on C-4 reports and the way in which this information is disclosed in ORCA have changed over time. In our guidance, PDC staff encourages filers to disclose vendor address in the description field for in-kind contributions.

Allegation: Missing Vendor Name & Address for Expenditures (2022)

- Your complaint specifically alleged that two expenditures disclosed on the Respondent’s post-Primary C-4 report for 7/26/2022 – 8/31/2022 (report 110118174) lacked vendor name and address details. These expenditures were reimbursements made to 1) Deborah Pattin on 8/23/2022 for wine costing \$60.99; and 2) Meren Gadman on 8/29/2022 for event food costing \$344.61.
  - The Respondent amended their post-Primary C-4 report on 9/10/2023 to include the missing details concerning the reimbursed expenditure made by Meren Gadman, who purchased food at Costco in Lacey, WA for an event that was held on 7/27/2022 (amended report [110171241](#)).
  - The amended report also included a notation regarding Deborah Pattin’s reimbursed expenditure for wine, which was purchased at Ralph’s Thriftway in Olympia, WA. The committee made this additional disclosure because the entry for Deborah Pattin no longer appears as an itemized expenditure but is instead included in the lump sum “Non-itemized expenditures” category. *This shift occurred because ORCA is programmed to reflect a 2023 rule change that increased the dollar amount for itemizing expenditures on reports from \$50 to \$200.*

### Allegation: Late Reporting (2020-2023)

- Your complaint alleged the Respondent filed late C-3 & C-4 reports for election years 2020, 2021, 2022 and 2023. The following findings concern the 88 (original) reports you alleged were late, as identified on the spreadsheet filed with your complaint:
  - Three C-4 reports for election year **2020** were filed 1-5 days late, including monthly C-4 reports for March and May, and one post-General C-4 report that was 1 day late. The committee did not make any contributions to candidates until 8/31/2020 and did not appear to participate in the Primary election. Total late reported contributions for 2020 (on C-4 reports) were \$7,114.22 and total late reported expenditures were \$3,038.02.
  - Eleven C-3 reports for election year **2020** were filed 1-3 days late.
  - One C-4 report for election year **2021** was filed 14 days late; this was the 7-day pre-Primary C-4 report. The committee did not make any contributions to candidates until 8/31/2021 and did not appear to participate in the Primary election. No expenditures were reported on the 7-day pre-Primary C-4 report. Total late reported contributions for 2021 (on C-4 reports) were \$1,000, and no expenditures were reported late.
  - Thirty-four C-3 reports for election year **2021** were filed 1-126 days late.
  - Six C-4 reports for election year **2022** were filed 12-90 days late. These included two pre-Primary, one post-Primary, and two pre-General C-4 reports, as well as one monthly C-4 report for December. The committee did not make any contributions to candidates until 9/20/2022 and did not appear to participate in the Primary election. Total late reported contributions for 2022 (on C-4 reports) were \$8,293.50 or 62% of total contributions, and total late reported expenditures were \$12,042.36 or 86% of total expenditures.
  - Twenty-three C-3 reports for election year **2022** were filed 7-146 days late.
  - Two C-4 reports for election year **2023** were filed 2-5 days late. The committee did not make any contributions to candidates until 8/31/2023 and did not appear to participate in the Primary election. Total late reported contributions for 2023 (on C-4 reports) were \$900 and total late reported expenditures were \$1,443.85.
  - Seven C-3 reports for election year **2023** were filed 2-21 days late.
- You alleged an additional ten amended C-3 and C-4 reports for election years 2020, 2021 and 2023 were late but did not provide any other details. Please be aware that the content and timing of amended reports determine whether they are late.

For example, if the underlying original report was timely submitted, the amended report is submitted within 21 days of the original, and the other requirements set forth in .235(10)(a) through (d) are met, no violation has occurred. The content of a report (or the

lack thereof) may also be a determining factor. For example, the lateness of an amended report might be mitigated if no substantive changes were made.

- Two of the ten allegedly late reports shown on your spreadsheet were amended more than 21 days after the original report was filed. The remaining eight reports appear to have been timely amended. No specific allegations were made in your complaint indicating what changed on the amended reports that made them late.
- Please note that fifteen of the C-3 and C-4 reports on your spreadsheet incorrectly show zero dollars (\$0.00) in the Total Activity column when in fact activity was disclosed on those reports.

#### C-4 Election Reports (2023)

- The Respondent's pre-election and post-election C-4 reports for 2023 were timely filed.

#### Additional Information

Noncompliance appears to have been the result of a good-faith misunderstanding concerning due dates for reports and is mitigated by an inexperienced past Treasurer. The five late C-4 reports for pre-Primary election and pre-General election reporting periods in 2021 and 2022 and corresponding late C-3 reports are aggravating factors because they deprived the public of information during time-sensitive periods prior to an election. However, the late pre-Primary reports for 2020-2023 are mitigated by the committee's lack of participation in the Primary election.

Based on our findings, staff has determined that, in this instance, the Respondent's failure to timely and accurately file C-3 and C-4 reports for election years 2020-2023 does not amount to violations that warrant further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Thurston County Democratic Women will receive a formal written warning concerning their failure to timely file *Campaign Summary Receipts & Expenditures* reports (C-4 reports) and *Cash Receipts, Monetary Contributions* reports (C-3 reports) for election years 2020-2023. The formal written warning will include PDC staff's expectation that Thurston County Democratic Women timely submit such reports in the future, especially during the time-sensitive periods prior to elections. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff is also reminding Thurston County Democratic Women about the importance of 1) disclosing the name and address of the vendor from whom an item or service is purchased, either as an in-kind contribution made to the committee or as an expenditure for which reimbursement is sought, on C-4 reports; and 2) submitting amended reports within 21 days of the original reports, whenever possible, in the future in accordance with PDC laws and rules or guidance.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

*Electronically signed Tabatha Blacksmith*  
Tabatha Blacksmith  
Compliance Officer

Endorsed by,

*Electronically signed Peter Frey Lavallee*  
Peter Frey Lavallee  
Executive Director

cc: Thurston County Democratic Women